

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
Forward-Looking Mechanism)	CC Docket No. 97-160
for High Support for)	
Non-Rural LECs)	

Motion for Extension of Time and Modification of

Data Response Requirement

Roseville Telephone Company (RTC), by its attorneys, and pursuant, in part, to Section 1.46 of the Commission's Rules, hereby requests an extension of time within which to file responses to the data requests made by the Common Carrier Bureau on August 7, 1998 in this proceeding¹. In addition, RTC requests permission to use an October-November billing period beginning in October 1998 as source data for reporting revenue information. Finally, RTC requests permission to use an alternative reporting method for historical data contained in Chart 1 of the August 7 order.

Request for Extension of Time

RTC is among sixteen local exchange carriers, including five RBOCs, GTE and United Telephone System, who were required in this proceeding to produce and

¹ See In the Matter of Federal-State Joint Board on Universal Service and Forward-Looking Mechanism for High Support for Non-Rural LECs, DA 98-1576 (August 7, 1998).

RTC serves a single study area and does not have the billing and reporting capability to perform a special study as quickly as requested by the Bureau. As a result, RTC faces a greater burden to comply with the request than the 250 hours estimated by the Bureau. In addition, the format required by the Bureau requires significant reprogramming of RTC's reporting software, which cannot be completed by the October 6, 1998 deadline in an efficient, cost effective manner.

As a result of these limitations, RTC requests an extension of time through December 7, 1998 to provide all of the information requested by the Bureau. Alternatively, RTC is able to provide limited information on a staggered basis³.

The Commission's reporting requirement for Charts 4 and 5 calls for an

³ RTC can provide information by the following dates:
October 6, 1998 - Chart 1: entire chart except for business classification
Charts 2 & 3: July 1998 total data only.
November 6, 1998 - Charts 2 and 3: entire charts
December 7, 1998 - All charts as modified by this request.

analysis of an entire month's billings, and further separation of data in those billings by total bill amount. The Commission's reporting requirement indicates that the data should be for the month of July 1998. RTC requests that it be permitted to use a similarly representative period beginning on October 20, 1998.

The RTC staff members who will produce the special study must do so in conjunction with performing their standard operational billing duties. Once RTC's software has been reprogrammed to report information in the manner requested by the Commission - a lengthy task in and of itself - data will need to be input to produce reports as required. In order to produce a report with July 1998 data, RTC staff would need to re-input an entire month of historical data and billings for all end-users. Replicating the July data would be onerously time consuming.

RTC seeks permission to use the period from October 20, 1998 to November 19, 1998, inclusive, as its reporting period. Use of this period will allow RTC staff to input information sought by the Commission concurrently with entering routine daily billing data, and thus will significantly reduce the reporting burden placed on RTC's staff and resources, and will promote efficient compliance with the Bureau's data request.

RTC believes that use of the October 20 through November 19 billing period will produce as representative a sample of data as use of the July 1998 period. Both the October-November period and the July period are comprised of 31 days which contain 23 weekdays and 8 weekend days. Further, both periods contain a Federal holiday (Independence Day and Veterans Day, respectively). RTC anticipates

charging the identical rates in the alternate period that it charged in July 1998.

Permitting RTC to use the October 20 through November 19 revenue data instead of July 1998 data should not skew any reports submitted to the Commission and will provide the Commission with adequate data for use in developing models based upon non-rural local exchange usage. RTC respectfully requests that it is permitted to use the billing period from October 20, 1998 through November 19, 1998, inclusive for preparation of Charts 4 and 5.

Request for Use of Modified Data in Historical Reporting

The Commission has requested that RTC provide a report containing historical revenue data for the first quarter of 1998 and the entirety of 1996 and 1997. The Commission also requests that RTC divide the reported data according to end-user classification.

RTC is able to provide the Commission with both historical revenue data and a report classifying such revenue according to business and residential end-users. However, RTC is unable to sub-divide the business end-user category according to number of subscriber lines which were actually in use at the time of billing. RTC cannot easily access billing records which are more than six months old as these records are not retained in a computer readable format; rather, archived billing data is transferred to microfilm. It is administratively infeasible for RTC to review microfilm which covers two and one quarter years of billings. Instead, RTC would be able to use interpolated figures, based upon current multi-line and single-line business end-users, and derive an accurate subtotal for bills rendered to these types of users.

Chart 1 requires classification of subscribers as residential, single-line business or multi-line business. Lines 16 through 20 of the chart will provide precise revenue totals for RTC. In addition, lines 1 through 5 of Chart 1 also will provide precise totals for residential subscribers. Further, the aggregate amounts for lines 6 through 15 - business subscribers - similarly will be precise. However, through the use of an interpolated business subscriber classification ratio, the allocation of revenue between multi-line and single-line business customers will be properly representative, although not precise. This allocation will not affect the accuracy of any totals. RTC requests that it be permitted to use interpolated figures for calculating subdivisions of business customers.

Wherefore, good cause having been shown, RTC requests that the Commission a) extend the RTC data submission deadline in the captioned proceeding to December 7, 1998 or allow submission of data according to the staggered schedule proposed in footnote 3 of this Motion; b) permit it to use the billing period from October 20, 1998 through November 19, 1998, inclusive, as its reporting period for Charts 4 and 5; and c) permit it to use a modified reporting method for determining historical separations of business customers.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul Feldman", with a long horizontal flourish extending to the right.

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